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1998 '99 DEC 20 10:26

December 12, 1999

FDA
Dockets Management Branch (HFA - 305)
5630 Fishers Lane, Room 1061
Rockville, MD 20852

RE: Docket No. 99D-4488 and 99D-4489

To Whom It May Concern:

I would like you to know that I have been growing my own sprouts for more than a year now. I eat a whole basket a day, all by myself, and sometimes make more as needed. I have never gotten sick from eating sprouts, nor has my friend, who grows and eats sprouts herself. Furthermore, I feel much better since eating them.

In your July 1999 warning you said, "Sprouts grown in the home also present a risk if eaten raw. Many outbreaks have been attributed to contaminated seed. If pathogenic bacteria are present in or on seed, they can grow to high levels during sprouting even under clean conditions."

If the seeds are contaminated, of course there is a problem. But how can you make such a blanket statement without telling people that certified organic seeds are not contaminated? Shouldn't the consumer know that they certainly can grow sprouts at home and do so safely? Don't you think this should have been addressed in that same statement? This was extremely misleading and a very great disservice to the certified organic seed farmers. If some people have gotten ill and I, who have eaten a larger-than-normal amount of sprouts for over a year, have thrived, it obviously must have to do with the seeds that I am using vs. the seeds they are using. Clearly this warning does not apply to me, or wouldn't I be one of these sick people if I've been eating them for more than a year in such large quantities?

The FDA should hire Certified Organic seed farmers and processors to aid in establishing guidelines which can be used to certify that seed produced for human consumption is safe. And the conventional farms should follow this. It makes no sense to reinvent the wheel that has worked so well for the certified organic growers and for those who have purchased from them. It truly makes no sense.

I do not want my seeds bleached! I eat sprouts for health reasons, and I do not see why I should think bleach of all things would make them healthier, when it is a toxic material. I buy seeds from three different companies, and they are all excellent. Of course, these are certified organic seeds, which you know are safe. So why should those who offer safe seeds be penalized (and thereby penalize the consumer)? Bleach is bad for the environment and certainly bad for me.

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Furthermore, I want good bacteria in my sprouts, and this is not something we can expect to be there once the seeds have been bleached!

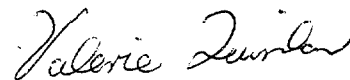
Please add a clause to the Guidance that states that "Certified Organic as well as seed certified by FDA as for human consumption is considered an acceptable alternative approach to prevention of microbial hazards in sprouted seeds." This is very, very important and the only thing that makes sense.

Furthermore, I feel that it would be unnecessary and enormously costly to expect small certified organic seed companies to have in-house labs. They are already doing the right thing, and their seeds are safe. Such needless action would affect me and all other consumers, and probably put them right out of business! How in the world could these small growers afford that? And why should it be necessary?

The problem is obviously coming from seeds grown by big business' conventional methods. By all means, insist that they adhere to certain standards so that the consumer can be assured of the prevention of microbial hazards. But please do not punish those who grow certified organic seeds. After all, if they had anything to do with this problem, I would have been sick a very long time ago by any of the three excellent companies with which I do business. It obviously cannot be them. Do not punish them. And do not punish me!

Thank you.

Sincerely yours,

A handwritten signature in cursive script, appearing to read "Valerie Quinlan".

Valerie Quinlan